

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION

This Document Relates to: ALL CASES

No. 2:09-cv-00037 (MJP)

**DECLARATION OF AMANDA F.
LAWRENCE IN SUPPORT OF
PLAINTIFFS' REPLY TO DEFENDANTS'
OPPOSITION MOTION TO EXCLUDE
THE PROFFERED EXPERT
TESTIMONY OF CHRISTOPHER
JAMES, Ph.D.**

**Note on Motion Calendar:
July 20, 2012**

DECLARATION OF AMANDA F. LAWRENCE IN SUPPORT OF
PLAINTIFFS' REPLY TO DEFENDANTS' OPPOSITION
MOTION TO EXCLUDE THE PROFFERED EXPERT
TESTIMONY OF CHRISTOPHER JAMES, Ph.D.
No. 2:09-cv-00037-MJP

SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565

1 I, Amanda F. Lawrence, hereby swear as follows:

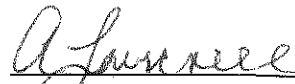
2 1. I am an attorney licensed to practice in the State of Connecticut. I am associated
3 with the law firm of Scott+Scott LLP, counsel of record for Plaintiffs. I make this declaration in
4 support of the Plaintiffs' Reply to Defendants' Opposition to Motion to Exclude the Proffered
5 Expert Testimony of Christopher James, Ph.D. I have personal knowledge of the matters stated
6 herein and, if called upon, I could and would competently testify thereto.

7 2. Attached as Exhibit 1 is a true and correct copy of excerpts of the transcript of the
8 June 21, 2012 deposition of Christopher James, Ph.D.

9 3. Attached as Exhibit 2 is a true and correct copy of excerpts of the transcript of the
10 June 28, 2012 deposition of Adam Levitin.

11
12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Executed this 20th day of July, 2012, at Colchester, Connecticut.

15
16 

17 Amanda F. Lawrence (admitted *pro hac vice*)
18 SCOTT+SCOTT LLP
19 156 South Main Street
20 Colchester, CT 06415
21 Telephone: 860-537-5537
22 Fax: 860-537-4432
23 E-mail: alawrence@scott-scott.com

24
25
26
27 DECLARATION OF AMANDA F. LAWRENCE IN SUPPORT OF
28 PLAINTIFFS' REPLY TO DEFENDANTS' OPPOSITION
MOTION TO EXCLUDE THE PROFFERED EXPERT
TESTIMONY OF CHRISTOPHER JAMES, Ph.D.
(NO. 2:09-CV-0037-MJP)

SCOTT+SCOTT LLP
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: (619) 233-4565

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record and additional persons listed below:

2:09-cv-00037-MJP Notice has been electronically mailed to:

Steve W. Berman (Terminated) steve@hbsslaw.com, heatherw@hbsslaw.com,
robert@hbsslaw.com

Larry Steven Gangnes gangnesl@lanepowell.com, docketing-sea@lanepowell.com,
donnellyjossm@lanepowell.com, gracen@lanepowell.com

David Daniel Hoff dhoff@tousley.com, efile@tousley.com

Stellman Keehnel stellman.keehnel@dlapiper.com, patsy.howson@dlapiper.com

Paul Joseph Kundtz pkundtz@riddellwilliams.com, jsherred@riddellwilliams.com,
lmoore@riddellwilliams.com

Bruce Earl Larson (Terminated) blarson@karrtuttle.com, psteinfeld@karrtuttle.com

John D Lowery jlowery@riddellwilliams.com

Louis David Peterson ldp@hcmp.com, smp@hcmp.com

Stephen M. Rummage (Terminated) steверummage@dwt.com, jeannecadley@dwt.com,
seadocket@dwt.com

Kim D Stephens kstephens@tousley.com, cbonifaci@tousley.com, lrolling@tousley.com,
wcruz@tousley.com

Robert D Stewart stewart@kiplinglawgroup.com

Dennis H Walters (Terminated) dwalters@karrtuttle.com, wbarker@karrtuttle.com

Mike Liles, Jr (Terminated) mliles@karrtuttle.com

Steven P Caplow (Terminated) stevencaplow@dwt.com, jasonSchattenkerk@dwt.com,
patrickwatts@dwt.com, seadocket@dwt.com, sheilarowden@dwt.com

Janissa Ann Strabuk jstrabuk@tousley.com, lrolling@tousley.com, mhottman@tousley.com,
wcruz@tousley.com

Walter Eugene Barton (Terminated) gbarton@karrtuttle.com, danderson@karrtuttle.com,

1 nrandall@karrtuttle.com

2 Gavin Williams Skok gskok@riddellwilliams.com, jsherred@riddellwilliams.com,
3 lmoore@riddellwilliams.com

4 David M Balabanian david.balabanian@bingham.com

5 Douglas C McDermott doug@mcdermottnewman.com, eric@mcdermottnewman.com

6 Susan L Hoffman susan.hoffman@bingham.com

7 Steven J Toll stoll@cohenmilstein.com, efilings@cohenmilstein.com

8 John D Pernick john.pernick@bingham.com

9 Steven W Fogg sfogg@corrchronin.com, hpowell@corrchronin.com,
10 reception@corrchronin.com

11 Brian C Free bcf@hcmp.com, bkp@hcmp.com

12 Christopher M Huck (Terminated) buck@kdg-law.com

13 Rogelio Omar Riojas omar.rijas@dlapiper.com, karen.hansen@dlapiper.com

14 Timothy Michael Moran moran@kiplinglawgroup.com, cannon@kiplinglawgroup.com

15 Richard A Speirs rspeirs@cohenmilstein.com

16 Bradley T. Meissner bmeissner@fenwick.com

17 Geoffrey M Johnson gjohnson@scott-scott.com, efile@scott-scott.com

18 Mary Kay Vyskocil mvyskocil@stblaw.com

19 Barry Robert Ostrager bostrager@stblaw.com, managingclerk@stblaw.com

20 Richard F Hans richard.hans@dlapiper.com, dorinda.castro@dlapiper.com

21 S Douglas Bunch dbunch@cohenmilstein.com

22 Darren J Robbins e_file_sd@csgrr.com

23 Jonathan Gardner jgardner@labaton.com

24 Daniel B Rehns drehns@cohenmilstein.com, efilings@cohenmilstein.com

25 Joel P Laitman jlaitman@cohenmilstein.com

1 Christopher E Lometti clometti@cohenmilstein.com

2 Michael H. Barr mbarr@sonnenschein.com

3 Kenneth J Pfaehler kenneth.pfaehler@snrdenton.com, nicole.reeber@snrdenton.com

4 Leslie D Davis ldavis@sonnenschein.com

5 Kevin P Chavous kchavous@sonnenschein.com

6 Paul Scarlato pscarlato@labaton.com, ElectronicCaseFiling@labaton.com

7 Frank Busch frank.busch@bingham.com, andrew.obach@bingham.com

8 Joseph P Guglielmo jguglielmo@scott-scott.com, efile@scott-scott.com

9 Kenneth M Rehns krehns@cohenmilstein.com, efilings@cohenmilstein.com

10 Adam Zurofsky azurofsky@cahill.com

11 Tammy Roy troy@cahill.com

12 Floyd Abrams fabrams@cahill.com

13 James J. Coster jcoster@ssbb.com, jregan@ssbb.com, managingclerk@ssbb.com

14 Joshua M. Rubins jrubins@ssbb.com, jregan@ssbb.com, managingclerk@ssbb.com

15 Theo J. Robins theo.robins@bingham.com

16 Brian O O'Mara bomara@rgrdlaw.com, e_file_sd@rgrdlaw.com, johnkg@rgrdlaw.com

17 Joshua S. Devore jdevore@cohenmilstein.com, efilings@cohenmilstein.com

18 Julie Goldsmith Reiser jreiser@cohenmilstein.com

19 Jee Young You jeeyoung.you@bingham.com

20 Walter W. Noss wnoss@scott-scott.com, efile@scott-scott.com

21 Anne L. Box abox@scott-scott.com, edewan@scott-scott.com, efile@scott-scott.com

22 Evan R. Chesler echesler@cravath.com

23 Thomas G. Rafferty trafferty@cravath.com

1 Daniel Slifkin dslifkin@cravath.com

2 Michael A. Paskin mpaskin@cravath.com

3 J. Wesley Earnhardt wearhardt@cravath.com

4 Jesse M. Weiss jweiss@cravath.com

5 John T Jasnoch jjasnoch@scott-scott.com, efile@scott-scott.com

6 Edward C. Signaigo esignaigo@scott-scott.com, efile@scott-scott.com

7 Hector J Valdes hvaldes@cravath.com

8 Ryan Wagenleitner rwagenleitner@scott-scott.com

9 **2:09-cv-00037-MJP Notice will not be electronically mailed to:**

10 WaMu Officer Defendants Securities MDL

11 **2:09-cv-00134-MJP Notice has been electronically mailed to:**

12 Naumon A Amjed namjed@btkmc.com, knguyen@btkmc.com

13 John A. Kehoe jkehoe@btkmc.com

14 Sharan Nirmul snirmul@btkmc.com

15 Joseph A. Fonti jfonti@labaton.com, ElectronicCaseFiling@labaton.com

16 Serena Richardson srichardson@labaton.com, ElectronicCaseFiling@labaton.com

17 **2:09-cv-00134-MJP Notice will not be electronically mailed to:**

18 WaMu Officer Defendants Securities MDL

19 **2:09-cv-00137-MJP Notice has been electronically mailed to:**

20 Christopher M Huck huck@kdg-law.com

21 Hollis Lee Salzman hsalzman@labaton.com, ElectronicCaseFiling@labaton.com

22 **2:09-cv-00137-MJP Notice will not be electronically mailed to:**

23 WaMu Officer Defendants Securities MDL

24 Julie Hwang

1 LABATON SUCHAROW LLP
2 140 BROADWAY
3 FLOOR 34
4 NEW YORK, NY 10005

5 **2:09-cv-01557-MJP Notice has been electronically mailed to:**

6 Gavin Williams Skok azurowsky@cahill.com, fabrams@cahill.com, troy@cahill.com

7 **2:09-cv-01557-MJP Notice will not be electronically mailed to:**

8 WaMu Officer Defendants Securities MDL

9 Dated July 20, 2012.

By: s/ Kim D. Stephens

By: s/ Janissa A. Strabuk

Kim D. Stephens, WSBA #11984

Janissa A. Strabuk, WSBA #21827

1700 Seventh Avenue, Suite 2200

Seattle, Washington 98101

Telephone: (206) 682-5600

Facsimile: (206) 682-2992

Email: kstephens@tousley.com

jstrabuk@tousley.com

Liaison Counsel for Plaintiffs and the Class